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BNDDUTY,JG

**U.S. District Court  
Southern District of Florida (Miami)  
CRIMINAL DOCKET FOR CASE #: 1:22-cr-20521-RNS-1**

Case title: USA v. FARNSWORTH, ET AL

Date Filed: 11/02/2022

Assigned to: Judge Robert N. Scola, Jr

**Defendant (1)****Theodore Farnsworth**

30214-510

YOB: 1962; ENGLISH

represented by **Jason H. Cowley**

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**Pending Counts**

15 U.S.C. § 78J(b); 78ff and 17 C.F.R. §  
240.10b-5 SECURITIES FRAUD  
(1)

18 U.S.C. § 1343 WIRE FRAUD  
(2-4)

**Highest Offense Level (Opening)**

Felony

**Terminated Counts**

None

**Highest Offense Level (Terminated)**

None

**Complaints**

None

**Disposition****Disposition****Disposition****Plaintiff**

USA

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Date Filed	#	Docket Text
11/02/2022	<a href="#"><u>1</u></a>	MOTION to Seal by USA as to Theodore Farnsworth, J. Mitchell Lowe. (dgj) (Entered: 11/03/2022)
11/02/2022	<a href="#"><u>2</u></a>	ORDER granting <a href="#"><u>1</u></a> Motion to Seal as to Theodore Farnsworth (1), J. Mitchell Lowe (2). Signed by Magistrate Judge Lisette M. Reid on 11/2/2022. <i>See attached document for full details.</i> (dgj) (Entered: 11/03/2022)
11/02/2022	<a href="#"><u>3</u></a>	INDICTMENT as to Theodore Farnsworth (1) count(s) 1, 2-4, J. Mitchell Lowe (2) count(s) 1, 2-4. (dgj) (Additional attachment(s) added on 11/3/2022: # <a href="#"><u>1</u></a> Restricted

		Unredacted Indictment) (dgj). (Entered: 11/03/2022)
11/03/2022		SYSTEM ENTRY - Docket Entry 4 restricted/sealed until further notice. (dgj) (Entered: 11/03/2022)
11/08/2022	<a href="#">5</a>	NOTICE OF ATTORNEY APPEARANCE Marx Calderon appearing for USA. Attorney Marx Calderon added to party USA(pty:pla) for Forfeiture Matters.. (pes) (Entered: 11/08/2022)
11/16/2022		Set/Reset Hearings as to Theodore Farnsworth, J. Mitchell Lowe: Initial Appearance set for 11/17/2022 01:30 PM in Miami Division before MIA Duty Magistrate Judge. (mml) (Entered: 11/16/2022)
11/17/2022	<a href="#">6</a>	Order to Unseal as to Theodore Farnsworth. Signed by Magistrate Judge Melissa Damian on 11/17/2022. (jbs) (Entered: 11/21/2022)
11/17/2022	<a href="#">8</a>	<p>Minute Order for proceedings held before Magistrate Judge Melissa Damian: Initial Appearance and <b>ARRAIGNMENT</b> as to Theodore Farnsworth (1) Count 1,2-4 held on 11/17/2022. Bond recommendation/set: Theodore Farnsworth (1) STIP \$1,000,000.00 PSB co-signed by Roderick Vanderbilt. Date of Arrest or Surrender: 11/17/2022. (Digital 13:41:06/14:32:40/15:52:56)</p> <p>It is ORDERED AND ADJUDGED that pursuant to the Due Process Protections Act, the Court confirms the United States obligation to disclose to the defendant all exculpatory evidence- that is, evidence that favors the defendant or casts doubt on the United States case, as required by <i>Brady v. Maryland</i>, 373 U.S. 83 (1963) and its progeny, and ORDERS the United States to do so. The government has a duty to disclose any evidence that goes to negating the defendants guilt, the credibility of a witness, or that would reduce a potential sentence. The defendant is entitled to this information without a request. Failure to disclose exculpatory evidence in a timely manner may result in consequences, including, but not limited to, exclusion of evidence, adverse jury instructions, dismissal of charges, contempt proceedings, disciplinary action, or sanctions by the Court.</p> <p>PAPERLESS STANDING DISCOVERY ORDER: The defendant(s) having been arraigned this date in open Court, it is Ordered that within 14 days of the date of this order that all parties to this action shall review and comply with Southern District of Florida Local Rules 88.10 (Criminal Discovery), and 88.9(c) (Motions in Criminal Cases). Upon a sufficient showing, the Court may at any time, upon a properly filed motion, order that the discovery or inspection provided for by this Standing Order be denied, restricted or deferred, or make such other order as is appropriate. It is expected by the Court, however, that counsel for both sides shall make a good faith effort to comply with the letter and spirit of this Standing Order. It shall be the continuing duty of counsel for both sides to immediately reveal to opposing counsel all newly discovered information or other material within the scope of Local Rule 88.10. Signed by Magistrate Judge Melissa Damian on 11/17/2022. (jbs) (Entered: 11/21/2022)</p>
11/21/2022	<a href="#">13</a>	\$1,000,000.00 PSB Bond Entered as to Theodore Farnsworth. Approved by Magistrate Judge Melissa Damian. <i>Please see bond image for conditions of release.</i> (Attachments: # <a href="#">1</a> Restricted Bond with 7th Page)(jbs) (Main Document 13 replaced to redact restricted information on 3/31/2023) (jbs). (Entered: 11/22/2022)
11/22/2022	<a href="#">11</a>	NOTICE OF ATTORNEY APPEARANCE: Henry Philip Bell appearing for Theodore Farnsworth, J. Mitchell Lowe . Attorney Henry Philip Bell added to party Theodore

		Farnsworth(pty:dft). (Bell, Henry) Modified on 11/22/2022 (drz). (Entered: 11/22/2022)
11/22/2022	12	Clerk's Notice to Filer re <a href="#">11</a> Notice of Attorney Appearance - Defendant. <b>Master Case Selected</b> ; ERROR - The filer selected the Master Case, instead of the applicable defendant. The correction was made by the Clerk. It is not necessary to refile this document. (drz) (Entered: 11/22/2022)
11/22/2022	<a href="#">14</a>	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Henry P. Bell. Filing Fee \$ 200.00. Receipt # AFLSDC-16122010 by Theodore Farnsworth. Responses due by 12/6/2022 (Attachments: # <a href="#">1</a> Certification of Jason Cowley, # <a href="#">2</a> Text of Proposed Order) (Bell, Henry) (Entered: 11/22/2022)
11/22/2022		Attorney update in case as to Theodore Farnsworth. Attorney Jason H. Cowley for Theodore Farnsworth added. (cw) (Entered: 11/23/2022)
11/29/2022	<a href="#">17</a>	Scheduling Order Setting Trial Date as to Theodore Farnsworth, J. Mitchell Lowe. Calendar Call set for 1/10/2023 09:00 AM in Miami Division before Judge Robert N. Scola Jr.. Jury Trial set for 1/17/2023 09:00 AM in Miami Division before Judge Robert N. Scola Jr.. Signed by Judge Robert N. Scola, Jr on 11/28/2022. <i>See attached document for full details.</i> (drz)  <a href="#">Pattern Jury Instruction Builder - To access the latest, up to date changes to the 11th Circuit Pattern Jury Instructions go to <a href="https://pji.ca11.uscourts.gov">https://pji.ca11.uscourts.gov</a> or click here.</a> (Entered: 11/29/2022)
12/01/2022	<a href="#">18</a>	First RESPONSE to Standing Discovery Order by USA as to Theodore Farnsworth, J. Mitchell Lowe (Fenton, Christopher) (Entered: 12/01/2022)
12/02/2022	<a href="#">19</a>	ORDER granting <a href="#">14</a> Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney(s) Jason H. Cowley, Esq. as to Theodore Farnsworth (1). Signed by Judge Robert N. Scola, Jr on 12/2/2022. <i>See attached document for full details.</i> (drz) (Entered: 12/02/2022)
12/08/2022	<a href="#">20</a>	NOTICE OF ATTORNEY APPEARANCE Blake Goebel appearing for USA. . Attorney Blake Goebel added to party USA(pty:pla). (Goebel, Blake) (Entered: 12/08/2022)
12/08/2022	<a href="#">21</a>	MOTION for Protective Order by USA as to Theodore Farnsworth, J. Mitchell Lowe. Responses due by 12/22/2022 (Attachments: # <a href="#">1</a> Exhibit A - Proposed Order)(Goebel, Blake) (Entered: 12/08/2022)
12/12/2022		SYSTEM ENTRY - Docket Entry 22 restricted/sealed until further notice. (pes) (Entered: 12/12/2022)
12/13/2022	<a href="#">23</a>	Unopposed MOTION to Provide Alternative Victim Notification Pursuant to 18 USC 3771(d)(2) by USA as to Theodore Farnsworth, J. Mitchell Lowe. Responses due by 12/27/2022 (Fenton, Christopher) (Entered: 12/13/2022)
12/13/2022	<a href="#">24</a>	ORDER AUTHORIZING THE USE OF ALTERNATIVE VICTIM NOTIFICATION PROCEDURES PURSUANT TO 18 U.S.C. § 3771(d)(2) granting <a href="#">23</a> Unopposed Motion to Provide Alternative Victim Notification Pursuant to 18 U.S.C. § 3771(d) as to Theodore Farnsworth (1), J. Mitchell Lowe (2). Signed by Judge Robert N. Scola, Jr on 12/13/2022. <i>See attached document for full details.</i> (drz) (Entered: 12/13/2022)

12/19/2022	<a href="#">25</a>	PROTECTIVE ORDER granting <a href="#">21</a> Motion for Protective Order as to Theodore Farnsworth (1), J. Mitchell Lowe (2). Signed by Judge Robert N. Scola, Jr on 12/16/2022. <i>See attached document for full details.</i> (jh) (Main Document 25 replaced on 12/22/2022) (jh). (Entered: 12/19/2022)
12/22/2022		SYSTEM ENTRY - Docket Entry 26 restricted/sealed until further notice. (amb) (Entered: 12/22/2022)
12/22/2022	<a href="#">27</a>	Defendant's MOTION to Amend/Correct <a href="#">25</a> Order on Motion for Protective/Confidentiality Order, by Theodore Farnsworth as to Theodore Farnsworth, J. Mitchell Lowe. Responses due by 1/5/2023 (Attachments: # <a href="#">1</a> Exhibit A - Proposed Amended Protective Order, # <a href="#">2</a> Exhibit B- Redline Against Protective Order, # <a href="#">3</a> Exhibit C- Vorley Protective Order, # <a href="#">4</a> Exhibit D- Coburn Protective Order, # <a href="#">5</a> Exhibit E- Collins Protective Order, # <a href="#">6</a> Exhibit F- Murray Protective Order, # <a href="#">7</a> Exhibit G- Blaszcack Protective Order, # <a href="#">8</a> Exhibit H- Simmons Protective Order, # <a href="#">9</a> Exhibit I- Block Protective Order, # <a href="#">10</a> Exhibit J- Walters Protective Order, # <a href="#">11</a> Exhibit K-nTuzman Protective Order, # <a href="#">12</a> Exhibit L - Goffer Protective Order, # <a href="#">13</a> Exhibit M - Rajaratnam Protective Order)(Bell, Henry) (Entered: 12/22/2022)
12/27/2022	28	PAPERLESS ORDER SETTING HEARING on <a href="#">27</a> Defendants' Joint Motion to Amend <a href="#">25</a> Protective Order: as to Theodore Farnsworth, and J. Mitchell Lowe. Motion Hearing set for 1/3/2023 09:30 AM in Miami Division before Judge Robert N. Scola Jr., via Zoom meeting. Join ZoomGov Meeting:  <a href="https://www.zoomgov.com/j/1616569118?pwd=Y0xRb3lGUVhoRTJQOUhWWnc1R1ZqUT09">https://www.zoomgov.com/j/1616569118?pwd=Y0xRb3lGUVhoRTJQOUhWWnc1R1ZqUT09</a>  Meeting ID: 161 656 9118 and Passcode: 305870  Signed by Judge Robert N. Scola, Jr on 12/27/2022. (jh) (Entered: 12/27/2022)
12/28/2022	<a href="#">29</a>	Unopposed MOTION to Continue Trial by Theodore Farnsworth as to Theodore Farnsworth, J. Mitchell Lowe. Responses due by 1/11/2023 (Attachments: # <a href="#">1</a> Text of Proposed Order)(Bell, Henry) (Entered: 12/28/2022)
12/30/2022	30	PAPERLESS ORDER SETTING HEARING on <a href="#">29</a> Unopposed MOTION to Continue Trial: as to Theodore Farnsworth, and J. Mitchell Lowe. Motion Hearing set for 1/3/2023 09:30 AM in Miami Division before Judge Robert N. Scola Jr., via Zoom meeting. Join ZoomGov Meeting:  <a href="https://www.zoomgov.com/j/1616569118?pwd=Y0xRb3lGUVhoRTJQOUhWWnc1R1ZqUT09">https://www.zoomgov.com/j/1616569118?pwd=Y0xRb3lGUVhoRTJQOUhWWnc1R1ZqUT09</a>  Meeting ID: 161 656 9118 and Passcode: 305870  Signed by Judge Robert N. Scola, Jr on 12/30/2022. (jh) (Entered: 12/30/2022)
01/03/2023	<a href="#">31</a>	AMENDED PROTECTIVE ORDER granting <a href="#">27</a> Motion to Amend/Correct as to Theodore Farnsworth (1), J. Mitchell Lowe (2). Signed by Judge Robert N. Scola, Jr on 1/3/2023. <i>See attached document for full details.</i> (drz) (Entered: 01/03/2023)
01/03/2023	32	PAPERLESS Minute Entry for proceedings held before Judge Robert N. Scola, Jr: Zoom Motion Hearing as to Theodore Farnsworth, and J. Mitchell Lowe held on 1/3/2023 re <a href="#">27</a> Defendant's MOTION to Amend/Correct <a href="#">25</a> Order on Motion for

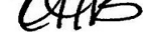
		Protective/Confidentiality Order filed by Theodore Farnsworth, and <a href="#">29</a> Unopposed MOTION to Continue Trial filed by Theodore Farnsworth. Government estimated trial will last fifteen days. Total time in court: 20 minutes. Other Appearance: J. Mitchell Lowe. Attorney Appearance(s): Christopher Fenton, Henry Philip Bell, Jason H. Cowley, Matthew I. Menchel, Adriana Riviere-Badell, and George Terwilliger. Court Reporter: Sharon Velazco, 305-523-5636 / Sharon_PellVelazco@flsd.uscourts.gov. (jh) Modified on 1/3/2023 (jh). (Entered: 01/03/2023)
01/03/2023	<a href="#">33</a>	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for George Terwilliger. Filing Fee \$ 200.00. Receipt # AFLSDC-16211470 by Theodore Farnsworth. Responses due by 1/17/2023 (Attachments: # <a href="#">1</a> Certification, # <a href="#">2</a> Text of Proposed Order)(Bell, Henry) (Entered: 01/03/2023)
01/03/2023	<a href="#">34</a>	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Benjamin A. O'Neil. Filing Fee \$ 200.00. Receipt # AFLSDC-16211528 by Theodore Farnsworth. Responses due by 1/17/2023 (Attachments: # <a href="#">1</a> Certification, # <a href="#">2</a> Text of Proposed Order)(Bell, Henry) (Entered: 01/03/2023)
01/03/2023	<a href="#">35</a>	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Roy G. Dixon. Filing Fee \$ 200.00. Receipt # AFLSDC-16211536 by Theodore Farnsworth. Responses due by 1/17/2023 (Attachments: # <a href="#">1</a> Certification, # <a href="#">2</a> Text of Proposed Order)(Bell, Henry) (Entered: 01/03/2023)
01/04/2023	<a href="#">36</a>	ORDER TO CONTINUE - Ends of Justice as to Theodore Farnsworth, and J. Mitchell Lowe - Time excluded from 12/28/2022 until 9/11/2023. Granting <a href="#">29</a> Unopposed MOTION to Continue Trial. Calendar Call set for 9/5/2023 09:00 AM in Miami Division before Judge Robert N. Scola Jr. Jury Trial set for 9/11/2023 09:00 AM in Miami Division before Judge Robert N. Scola Jr. Signed by Judge Robert N. Scola, Jr on 1/3/2023. <i>See attached document for full details.</i> (jh) (Entered: 01/04/2023)
01/04/2023		Attorney update in case as to Theodore Farnsworth. Attorney Roy G. Dixon, III, Benjamin A. O'Neil, George J. Terwilliger, III for Theodore Farnsworth added (pt) (Entered: 01/04/2023)
01/04/2023	<a href="#">37</a>	ORDER granting <a href="#">34</a> Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney(s) Benjamin A. O'Neil, Esq. as to Theodore Farnsworth (1). Signed by Judge Robert N. Scola, Jr on 1/4/2023. <i>See attached document for full details.</i> (drz) (Entered: 01/04/2023)
01/04/2023	<a href="#">38</a>	ORDER granting <a href="#">33</a> Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney(s) George J. Terwilliger, III Esq. as to Theodore Farnsworth (1). Signed by Judge Robert N. Scola, Jr on 1/4/2023. <i>See attached document for full details.</i> (drz) (Entered: 01/04/2023)
01/04/2023	<a href="#">39</a>	ORDER granting <a href="#">35</a> Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney(s) Roy G. Dixon, III, Esq. as to Theodore Farnsworth (1). Signed by Judge Robert N. Scola, Jr on 1/4/2023. <i>See attached document for full details.</i> (drz) (Entered: 01/04/2023)

02/02/2023	<a href="#">41</a>	NOTICE OF ATTORNEY APPEARANCE Lauren A. Archer appearing for USA. . Attorney Lauren A. Archer added to party USA(pty:pla). (Archer, Lauren) (Entered: 02/02/2023)
02/07/2023	<a href="#">42</a>	Second RESPONSE to Standing Discovery Order by USA as to Theodore Farnsworth, J. Mitchell Lowe (Archer, Lauren) (Entered: 02/07/2023)
02/28/2023	<a href="#">43</a>	SPEEDY TRIAL REPORT by USA as to Theodore Farnsworth, J. Mitchell Lowe (Archer, Lauren) (Entered: 02/28/2023)
03/09/2023	<a href="#">44</a>	NOTICE OF ATTORNEY APPEARANCE Matthew Reilly appearing for USA. . Attorney Matthew Reilly added to party USA(pty:pla). (Reilly, Matthew) (Entered: 03/09/2023)
04/07/2023	<a href="#">45</a>	Third RESPONSE to Standing Discovery Order by USA as to Theodore Farnsworth, J. Mitchell Lowe (Archer, Lauren) (Entered: 04/07/2023)
05/09/2023	<a href="#">46</a>	Petition for Leave of Court to File Amicus Brief and Proposed Amicus Brief by Shadwick Vick as to Theodore Farnsworth, J. Mitchell Lowe. Responses due by 5/23/2023 (drz) (Entered: 05/09/2023)
05/09/2023	47	PAPERLESS ORDER denying <a href="#">46</a> Petition for Leave of Court to File Amicus Brief as to Theodore Farnsworth (1), and J. Mitchell Lowe (2). Signed by Judge Robert N. Scola, Jr on 5/9/2023. (jh) (Entered: 05/09/2023)
05/15/2023	<a href="#">48</a>	Fourth RESPONSE to Standing Discovery Order by USA as to Theodore Farnsworth, J. Mitchell Lowe (Archer, Lauren) (Entered: 05/15/2023)
05/30/2023	<a href="#">49</a>	Fifth RESPONSE to Standing Discovery Order by USA as to Theodore Farnsworth, J. Mitchell Lowe (Archer, Lauren) (Entered: 05/30/2023)
06/02/2023	<a href="#">52</a>	Unopposed MOTION to Continue Trial <i>Defendants' Motion to Continue Trial</i> by Theodore Farnsworth as to Theodore Farnsworth, J. Mitchell Lowe. Responses due by 6/16/2023 (Attachments: # <a href="#">1</a> Text of Proposed Order)(Bell, Henry) (Entered: 06/02/2023)
06/06/2023	<a href="#">53</a>	ORDER TO CONTINUE - Ends of Justice as to Theodore Farnsworth, and J. Mitchell Lowe - Time excluded from 6/2/2023 until 9/9/2024. Granting <a href="#">52</a> Unopposed MOTION to Continue Trial Date. Calendar Call set for 9/3/2024 09:00 AM in Miami Division before Judge Robert N. Scola Jr. Jury Trial set for 9/9/2024 09:00 AM in Miami Division before Judge Robert N. Scola Jr. Signed by Judge Robert N. Scola, Jr on 6/5/2023. <i>See attached document for full details.</i> (jh) (Entered: 06/06/2023)
06/28/2023	<a href="#">56</a>	Sixth RESPONSE to Standing Discovery Order by USA as to Theodore Farnsworth, J. Mitchell Lowe (Archer, Lauren) (Entered: 06/28/2023)
07/28/2023		SYSTEM ENTRY - Docket Entry 57 restricted/sealed until further notice. (jh) (Entered: 07/28/2023)
07/28/2023		SYSTEM ENTRY - Docket Entry 58 restricted/sealed until further notice. (jh) (Entered: 07/28/2023)

United States Government  
M E M O R A N D U M

**DATE:** July 28, 2023

CONFIDENTIAL  
DO NOT FILE DO NOT SCAN  
RETURN TO PROBATION

**FROM:** Nora Heredia-Burgos   
United States Probation Officer  
Miami Lakes, FL  
Office: (305) 512-1803  
Cellular: (786) 348-3063  
Email: nora\_heredia-burgos@flsp.uscourts.gov

**SUBJECT:** **FARNSWORTH, Theodore**  
**Docket No.: 1:22-CR-20521-RNS-1**  
**SD/FL PACTS No.: 8208841**

**TO:** The Honorable Robert N. Scola, Jr.  
United States District Judge  
Miami, FL

**VIOLATION MEMORANDUM – REQUEST FOR PETITION AND WARRANT**

**PRESENT COURT STATUS**

On November 4, 2022, the defendant was arrested in the District of Columbia, on a warrant out of the Southern District of Florida based on an Indictment that charges him with Count 1: Securities Fraud, 15 U.S.C. §§ 78j(b), 78ff and 17 C.F.F. § 240.10b-5 and, Counts 2-4: Wire Fraud, 18 U.S.C. § 1343.

On November 4, 2022, the defendant appeared before The Honorable Moxila A. Upadhyaya, Magistrate Judge for the District of Columbia. The defendant was ordered released on an Appearance Bond with special conditions.

On November 17, 2022, the defendant appeared before The Honorable Melissa Damian, United States Magistrate Judge, for an Initial Appearance and Arraignment hearing. The bond was set at \$1,000,000.00 personal surety, co-signed by Roderick Vanderbilt. The defendant was released with the following special conditions: 1) Surrender all passports and travel documents, if any, to the Pretrial Services Office and not obtain any travel documents during the pendency of the case; 2) Report to pretrial Services as directed; 3) Avoid all contact with victims or witnesses to the crimes charged, except through counsel. 4) Avoid all contact with co-defendants and defendants in related cases, except through counsel; 5) Refrain from possessing a firearm, destructive device or other dangerous weapons and shall surrender (if any), their concealed weapons permit to the U. S. Probation Office; 6) Signatories may not sell, pledge, mortgage, hypothecate, encumber, etc. any real property until the bond is discharged, or is otherwise modified by the Court. 7) The defendant may travel to the Southern District of Florida, Northern District of New York, and the Southern District of New York, for business purposes, and the District of Columbia metropolitan area for purposes of meeting with counsel. He is authorized to travel as needed, to go between these districts. 8) The defendant may travel throughout the United States as authorized by Pretrial Services, in advance of any such travel, without further leave of Court. 9) The defendant is prohibited from the sale, offering or promotion of any securities, including equity, debt, or hybrid securities, without the permission of the

The Honorable Robert N. Scola, Jr.  
United States District Judge  
Miami, FL  
July 28, 2023  
Page 2

**RE: FARNSWORTH, Theodore**  
**Docket No.: 1:22-CR-20521-RNS-1**  
**SD/FL PACTS No.: 8208841**

government or Pretrial Services, except for any securities of, or belonging to or involving Zash Global Media, Vinco Ventures, Inc. or Icon Publishing, or any affiliates or subsidiaries of these entities. 10) Individual surety Roderick Vanderbilt agrees that this bond is secured by his real property located on Northeast 18<sup>th</sup> Street, Miami, Florida.

A Calendar Call is set for September 3, 2023, and a Jury Trial is set for September 9, 2023, before Your Honor.

#### **NATURE OF VIOLATION**

On July 20, 2023, this officer received a compliance message from United States Probation Officer (USPO) Michael Christopher, from the Northern District of New York, where the defendant resides. USPO Christopher indicated that, on July 10, 2023, he unsuccessfully attempted to conduct a visit of the defendant at his residence. An individual at the residence, who identified himself as an employee of the defendant, indicated the defendant was in Florida. On July 11, 2023, USPO Christopher conducted a virtual meeting with the defendant, through a videocall application; the defendant was outside a hotel in Miami Beach.

USPO Christopher verbally reprimanded the defendant and reminded him of post-release instructions provided, to notify the USPO of whereabouts and travels. USPO Christopher asked the defendant to provide him with documentation as to the purpose of the travel. As of this writing, the defendant has not provided the requested documents.

#### **SUPERVISION ADJUSTMENT**

The defendant has been under the supervision of U.S. Probation Officer Specialist Michael Christopher, in the Northern District of New York. USPO Christopher has indicated the defendant maintains verifiable residence at his approved address in Baldwinsville, New York. He advised the defendant reports employment with VINCO Ventures and Zash Global Media & Entertainment.

On July 12, 2023, Assistant United States Attorney (AUSA) Christopher Fenton notified this officer, via email, that he had been notified the defendant had contact with law enforcement in May 2023. AUSA Fenton shared police and court documents that reflect the defendant has had law enforcement contact, since on or about May 5, 2023, arising from disputes between the defendant and an individual by the name of Mateo May. A review of the documents revealed ongoing court proceedings regarding domestic-related incidents, which have resulted in temporary protection orders issued against the defendant and against Mr. May.

Upon inquiry, USPO Christopher indicated the defendant had not reported contact with law enforcement. USPO Christopher questioned the defendant regarding his failure to notify the USPO of contact with law enforcement. The defendant responded he had reported it. USPO Christopher conducted a review of his records and confirmed the defendant had not reported law enforcement contact. The defendant has been reinstructed as to this condition.

The Honorable Robert N. Scola, Jr.  
United States District Judge  
Miami, FL  
July 28, 2023  
Page 3

**RE: FARNSWORTH, Theodore**  
**Docket No.: 1:22-CR-20521-RNS-1**  
**SD/FL PACTS No.: 8208841**

**RECOMMENDATION**

This officer respectfully recommended the defendant's bond be modified to include the special condition that, for travel throughout the United States, the defendant must seek authorization from Pretrial Services in advance of any and all travel. However, upon submitting the request, Your Honor indicated to submit a warrant with no bond. As such, please find the attached Petition and warrant.

Respectfully submitted,

Reviewed and Approved by:



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**Diane Acquaviva, Supervisory**  
**United States Probation Officer**  
**Diane\_Acquaviva@flsp.uscourts.gov**  
**(305) 512-1824**

cc: The Honorable Melissa Damian , United States Magistrate Judge  
Christopher Fenton, Assistant United States Attorney  
Henry P. Bell/George Terwilliger, III, Defense Counsel

# UNITED STATES DISTRICT COURT

for the

Southern District of Florida

UNITES STATES OF AMERICA,

v.

Case No. 1:22-CR-20521-RNS-1

THEODORE J. FARNSWORTH

*Defendant*

## ARREST WARRANT

To: **The United States Marshal  
and any authorized law enforcement officer**

**YOU ARE HEREBY COMMANDED** to arrest Theodore Joseph Farnsworth and bring him/her forthwith to the nearest magistrate to answer a(n)

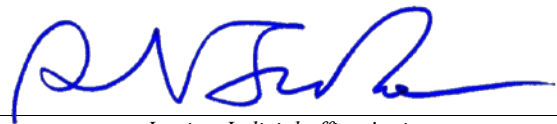
- ☐ Indictment ☐ Information ☐ Complaint ☐ Order of Court ☐ Violation Notice  
☒ Pretrial Services Violation Petition

charging him with Bond Violation, in violation of Title 18 United States Code, Section 3148.

No bond is recommended by U.S. Probation Officer Nora Heredia-Burgos.

**Bail fixed at: no bond.** Upon arrest of the defendant, he is to be brought before the Duty Magistrate Judge only for the purposes of advising the defendant of the charges against [him/her] and for appointment of counsel. All other matters including bond will be held before United States District Judge Robert N. Scola, Jr.

Date: July 28, 2023



*Issuing Judicial officer's signature*

City and state: Miami, FL

Robert N. Scola, Jr., United States District Judge

*Printed name and title*

### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

*Arresting officer's signature*

*Printed name and title*

cc: United States Probation Office  
United States Marshal Service